

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:	)	
	)	Chapter 11
VYAIRE MEDICAL, INC., <i>et al.</i> , ¹	)	Case No. 24-11217 (BLS)
	)	(Jointly Administered)
Debtors.	)	Re: Docket Nos. 250, 575, & 625

**CERTIFICATION OF COUNSEL REGARDING
FIRST NOTICE OF REJECTION OF CERTAIN EXECUTORY CONTRACTS**

The undersigned counsel to Vyair Medical, Inc. and certain of its affiliates, the debtors and debtors in possession in the above-captioned cases (collectively, the “Debtors”), hereby certifies as follows:

1. On September 27, 2024, the Debtors filed the *First Notice of Rejection of Certain Executory Contracts* [Docket No. 575] (the “Rejection Notice”), seeking to authorize the Debtors to reject certain contracts set forth on Exhibit A thereto and attaching as Exhibit B thereto, the *First Order Authorizing the Debtors to Reject Certain Executory Contracts* (the “Proposed Order”).
2. On October 11, 2024, Quad DBC Holding, LLC (the “Landlord”) filed the *Limited Objection of Quad DBC Holdings, LLC to First Notice of Rejection of Certain Executory Contracts* [Docket No. 625] (the “Objection”).

¹ The last four digits of Debtor Vyair Medical, Inc.’s federal tax identification number are 6495. A complete list of each of the Debtors in these chapter 11 cases and each such Debtor’s federal tax identification number may be obtained on the website of the Debtors’ proposed claims and noticing agent at <https://omniagentsolutions.com/Vyair>. The location of Debtor Vyair Medical, Inc.’s principal place of business and the Debtors’ service address in these chapter 11 cases is 26125 North Riverwoods Boulevard, Mettawa, Illinois, USA 60045.

3. The Debtors and the Landlord agreed to resolve the Objection as set forth in the revised form of order in connection with the Rejection Notice, which is attached hereto as **Exhibit 1** (the “Revised Proposed Order”). A blackline comparing the Revised Proposed Order against the Proposed Order filed with the Rejection Notice is attached hereto as **Exhibit 2**.

4. The Debtors respectfully request that the Court enter the Revised Proposed Order at its earliest convenience.

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Dated: October 22, 2024
Wilmington, Delaware

/s/ Patrick J. Reilley

COLE SCHOTZ P.C.

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